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**MOTION TO PROCEED UNDER PSEUDONYM**

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MASSACHUSETTS**

U.S. District Court  
DISTRICT OF MASS.

**John Doe,**

Plaintiff,

v.

**AstraZeneca Pharmaceuticals LP,**

Defendant.

Civil Action No.:

**PLAINTIFF'S MOTION TO PROCEED UNDER PSEUDONYM**

**Plaintiff John Doe**, proceeding pro se, respectfully moves this Court for an order permitting him to prosecute this action under a pseudonym. In support, Plaintiff states:

**1. Grounds for Anonymity**

Plaintiff seeks anonymity due to:

- **Severe Psychological Harm:** Plaintiff's claims involve sensitive mental health issues stemming from Defendant's drug (Seroquel), including addiction, trauma, and social stigmatization. Public disclosure would exacerbate his distress.
- **Fear of Retaliation/Exploitation:** Plaintiff's complaint alleges he was exploited while under the drug's influence (e.g., harassment, assault). His real name's disclosure could invite further targeting.

- **Highly Personal Nature of Claims:** The case involves intimate details of Plaintiff's medical history and a family sexual assault incident (Compl. ¶ 14), warranting privacy under *Doe v. Del Rio*, 241 F.R.D. 154 (S.D.N.Y. 2006).

## 2. Legal Standard

Courts permit pseudonyms where privacy interests outweigh public access, considering:

- **Plaintiff's Vulnerability:** *Doe v. Porter*, 370 F.3d 558 (6th Cir. 2004) (allowing anonymity for mental health stigma).
- **Nature of Allegations:** *Doe v. Megless*, 654 F.3d 404 (3d Cir. 2011) (sexual assault victims may proceed anonymously).

## 3. Balancing Test Favors Anonymity

- **No Prejudice to Defendant:** AstraZeneca can defend itself without knowing Plaintiff's identity.
- **Public Interest Minimized:** This case concerns individual harm, not public wrongdoing.

**WHEREFORE**, Plaintiff respectfully requests that the Court grant leave to proceed as "John Doe."

Respectfully submitted,

**John Doe, Pro Se Plaintiff**

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